

WM. Branch : Civil Action No. 1:CV-00-1720  
Plaintiff :  
Vs. : (Judge Conner)  
MR Russian et. al., :  
Defendants :

FILED  
HARRISBURG  
APR 05 2004  
MARY E. J. AREA, CLERK  
DEPUTY CLERK

Brief in support of motion  
for Emergency Injunctive Relief and  
a Restraining order

if it Please's this most august tribune Here comes  
inmate William Branch #3756 Submitting this BRIEF in support  
of his motion for Emergency Injunctive Relief and a Restraining  
order Per fed. Rules of Civil Procedure Rule 65. (b) (d)

I was falsly charged by ms Dipple with lying to a staff  
member misconduct No. 295183 Down Graded to informal  
Resolution. I was Give 7 days Cell Restriction which I have  
served, I posted a Request to Supt. Colkeran and to the Court  
stating the due Process Violation and denying that I told ms  
Dippel I was going to Tumah see: Exhibit R-1 of Exhibits  
To Compel Discovery Dated 3-25-04. as stated in the D.O.C  
Policy 801 Dated 4-17-2000 Pg. 5 A. (3) the misconduct  
must Be Submitted before the tour of duty if not the Reason  
must be included. the incident Date 3-19-04, Date Reported  
3-22-04 Per misconduct No Reason stated for the delay  
yet I was sanction to 7 days Cell Restriction.

Today march 31, 2004 at approximately 3: pm I was  
approached by Lt. Freethy who made threats against my  
Physical Person if I Did not Discontinue my Present  
Civil Suit Against Ms Dippel, capt. Griffin, Ms Surace, Mr Friedman

all friends and co-workers of Lt Freethy (also a Defendant in my Supplement Pleading) here at Sgt. Waymair. Because of my imprisonment at this Prison, I am in no position to leave or avoid Mr Freethy or the Defendants in my suit. Who because of their position as D.O.C. staff, have virtually unlimited access and control over my person. This relationship places me in an unduly hazardous predicament, and after today's encounter, I feel I can trust no prison staff to go against superiors, co-workers, or friends to insure my ~~safety~~ safety.

Your Honor, as this Court is aware I am involved in an on-going legal battle against the staff, which has resulted in continued harassments, and abuses against. Now, as a hearing to determine the outcome of these matters approaches I witness the verbal, threats, harassments and abuses against me are escalating toward dangerous levels, and I feel my health, safety and well being are in danger. and because of the uniqueness of my relationship to the Defendants, I feel my life is in peril. It is my opinion that misconducts, solitary confinements and abuse of power that have been previously used to intimidate, chill and frustrate my legal redress have matured (Point: the muslim inmate approaching me stating "I do not appreciate you playing with my religion" after Ms Dippel asked him if I was at Jumah.) This is a legitimate and potentially life threatening level.

Lt Freethy also told me that they ~~would~~ would have Ms Dippel rewrite the misconduct and that I would get more time and not a informal resolution.

I feel that the longer I am in this Prison, the closer I come to physical harm also, that due to the nature of the relationship would not quash the potentially life-threatening environment I ~~am~~ presently find myself in therefore, I request that I be moved to a federal jurisdiction for my safety.

Wherefore, I Pray the most august Tribune will Grant This Ignoble inmate William Branch of 3756 Emergency Injunction Relief and a Restraining order, forbidding them to take any action against me in any form and that a transfer be ordered to a federal Jurisdiction/ Prison as soon as possible.

Per. fed. Rules of civil Procedure Rule 65. (b) affidavit inclosed affirming that there exist and immediate and irreparable injury, loss of being in General Population as they have already Violated my du Process Rights with Right up No. 295183 and because this can happen again before the matter can be heard I ask for A Temporary order also

Prayerfully I ask this most Honorable Court to Grant Requested Emergency Injunction and Transfer

I also want to state for the Record that when I was studying the muslim faith I had attended Jumah But after 9-11-01 the Twin Towers I have not attended Jumah as I felt it would Create a stumbling block for my Brothers.

Respectfully

Proof of Service

Ms. Mosley c/o S.A.S. 15<sup>th</sup> Floor Strawberry Sq. Harrisburg Pa 17120

Unsworn Declaration

I Affirm under Penalty of the Law that the above is true

Date 3-31-04

William Branch CF 3756

Po Box 256

Waymart Pa 18472

7042 1000 0005 3444 2510  
Way Mart, Pennsylvania 18472-0256

Wm Brand CF3756

Po Box 956  
Way Mart PA 18472

Mail  
Judge Conner  
PO Box 953  
Harrisburg Pa

PER  
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